

1 JAMES SHIELDS BEASLEY, ESQ.
2 Nevada Bar No. 1733
3 Law Offices of James Shields Beasley
4 435 Court Street
5 P.O. Box 2936
6 Reno, Nevada 89505
7 Telephone: (775) 329-6852
8 Facsimile: (775) 329-2174
9
10 Attorney for Plaintiffs Yosef L. Mustafanos
11 and Shirley Jean Clifton
12
13

14
15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA, NORTHERN DIVISION**
17

18 YOSEF L. MUSTAFANOS and } Civil Action No. 3:15-cv-00227-RCJ-VPC
19 SHIRLEY JEAN CLIFTON by }
20 and through YOSEF L. }
21 MUSTAFANOS, her legally }
22 appointed guardian, }
23 Plaintiffs, }
24 vs. }
25 LYON COUNTY, GREGORY }
26 KANTZ, DEBORAH JUNE }
27 STRODE, LAURA DEPAOLI, }
28 ANDREW STRODE, EDWARD }
29 ANDERSON, and DOES 1-10, }
30 inclusive, }
31 Defendants }
32
33

34 **MOTION TO WITHDRAW AS ATTORNEY OF RECORD**

35 James Shields Beasley, counsel of record for plaintiffs Yosef L. Mustafanos and
36 Shirley Jean Clifton in the above-entitled matter, moves this Court for its Order
37 permitting his withdrawal as counsel of record.
38

39 This request is made upon the ground that there exists a communication
40 breakdown between counsel and plaintiffs Yosef L. Mustafanos and Shirley Jean
41 Clifton in connection with the manner in which plaintiffs' claims should be prosecuted
42

1 against defendants. The breakdown in communication has become such that counsel
2 of record can no longer provide plaintiffs with effective representation. If the Court
3 would like further details before acting on this request, counsel will be happy to
4 provide it to the Court under seal.

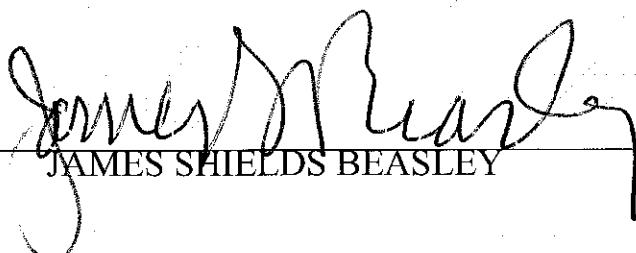
5 There is no compelling reason for this Court to require counsel of record to
6 continue to represent plaintiffs in light of the fact that the discovery cut-off in this case
7 is not until November 3, 2015, and the trial of this case is not scheduled until next year.

8 The physical address, telephone number, and email address of plaintiffs Yosef
9 L. Mustafanos and Shirley Jean Clifton are as follows:

10 Yosef L. Mustafanos
11 Shirley Jean Clifton
12 5400 Railroad Street
13 Silver Springs, Nevada 89429
14 (775) 980-5688
15 aoexpress@ymail.com

16 DATED this 30th day of September, 2015.

17 LAW OFFICE OF JAMES SHIELDS BEASLEY
18 Attorney for Plaintiffs Yosef L. Mustafanos and
19 Shirley Jean Clifton
20 435 Court Street
21 P.O. Box 2936
22 Reno, Nevada 89505

23 By 
24 JAMES SHIELDS BEASLEY

CERTIFICATE OF SERVICE

I certify that I am an employee of the Law Office of James Shields Beasley, and that on this date, pursuant to the agreement of the parties, I emailed a true and correct copy of the following document:

MOTION TO WITHDRAW AS ATTORNEY OF RECORD

addressed to the following at the email addresses which are indicated:

Katherine F. Parks
Brian Brown
Thorndahl Armstrong Delk
Balkenbush & Eisinger
6590 S. McCarran Blvd., Suite B
Reno, Nevada 89509
Attorney for Defendants
Lyon County and Gregory Kantz
kfp@thorndahl.com

David C. O'Mara
O'Mara Law Firm
311 E. Liberty Street
Reno, Nevada 59505
Attorney for Defendant Deborah
June Strode
david@omaralaw.net

Caryn S. Tijsseling
Lemons Grundy & Eisenberg
6005 Plumas Street, Suite 300
Reno, Nevada 89519
*Attorney for Defendant Laura
DePaoli*
cst@lge.net

Barry L. Breslow
Frank C. Gilmore
Robison, Belaustegui, Sharp and Low
71 Washington Street
Reno, Nevada 89503
Attorneys for Defendant Andrew Strode
fgilmore@rbsllaw.com

and that I mailed a copy of the same by first class mail, postage prepaid, to:

Edward Anderson, *pro per*
5035 Geraldine Avenue
Silver Springs, Nevada 89429

Yosef L. Mustafanos
Shirley Jean Clifton
5400 Railroad Street
Silver Springs, Nevada 89429
aoexpress@ymail.com

DATED this 2nd day of October, 2015.

Charles Vargas Beasley
CHARLES VARGAS BEASLEY